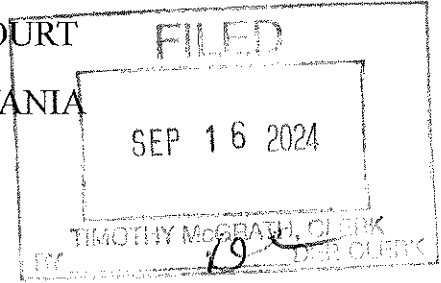


UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA



INRE:

CAMPISI CONSTRUCTION, INC.

DEBTOR

BKY, NO. 14-12458JKF

**MOTION FOR SANCTIONS**

Anthony Campisi co-debtor Campisi Construction, respectfully request sanctions be awarded for a multitude of wrong doings by ECI, LLC. , and attorney Robert Saracini. Rule 8020

1. On March 31, 2014, the Debtor filed a voluntary petition for relief under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Pennsylvania, which was converted to chapter 7 on June 24, 2015.
2. Thereafter, the Office of the United States Trustee appointed Terry Dershaw as Trustee
3. On January 12, 2016 A Stipulation and Consent Order of Settlement between the Chapter 7 Trustee, ECI, LLC and Creditor Cougar Development Group, LLC was entered as exhibit 1 Doc #473 Trustees Motion of Approval of Settlement. **EXHIBIT A**
4. On March 16, 2016 the Honorable Judge Jean K Fitzsimon Granted the Trustees Motion. **EXHIBIT B**
5. ECI pleads any monies received during bankruptcy does not reduce the judgment amount. That is false.
6. Paragraph 1 of the Stipulation reads
  - I. *"Further, it is understood and agreed that this Settlement shall not have any adverse effect, be deemed a release or in any other way bar or prohibit Creditor or Cougar or any of their members or any other party hereto from pursuing Anthony G. Campisi personally for any judgment, deficiency claims, existing claims, future claims, known or unknown, in a court of competent jurisdiction."*

7. ECI had Settled with Campisi Construction and received his Judgment amount.
8. The Stipulation clearly states any additional money received for attorney fee's, etcetera will not be applied to the Judgement amount.
9. On April 2, 2018 ECI received relief from the automatic stay under section 362 of the Bankruptcy Code pursuant to Bankruptcy Procedure Rule 4001 the reply of Interested party Anthony G Campisi as an individual. **EXHIBIT C**
10. ECI/Cougar now had the right to pursue Anthony G Campisi as an individual in existing State Court Actions (identified at each paragraph) and file a separate action for the equipment abandoned by the Trustee, "specifically against Anthony Campisi and allowing him to defend himself in that action". See transcript of Judge Fitzsimon directing Mr. Spause. **EXHIBIT D**
11. Exhibit C identifies all equipment abandoned and specifically list a Bobcat E 42 that was not part of the abandoned equipment and ECI could not pursue. **EXHIBIT E**
12. On July 1, 2016 ECI entered private property and stole all equipment that was abandoned and new equipment (NOT PART OF BANKRUPTCY) Judge Fitzsimon specifically said he could not pursue. **EXHIBIT F**
13. On September 9, 2019 ECI filed a Motion to Approve disposition of abandoned equipment to ECI (DOC 538) and stated that ECI secured the permission of the Trustee to file a UCC-1 Finance statement<sup>1</sup>. **EXHIBIT G**
14. ECI also stated the Trustee allowed him to gather and assemble the assets.

---

<sup>1</sup> ECI first attempted this motion in Montgomery County but withdrew the motion. After it was denied in Bankruptcy Court attorney Birch withdrew his appearance.

15. On September 27, 2016 The Trustee (Terry Dershaw filed an answer and stated ECI motion is false The Trustee did NOT allow anything ECI stated and denied his motion. **EXHIBIT H**
16. **According to Judge Fitzsimons ORDER , ECI violated the Order and Sanctions should be awarded per day rental , per machine starting July 1, 2016**
17. On October 12, 2018 ECI filed a petition to Confirm FEDERAL BANKRUPTCY COURT JUDGEMENT on his unsecured proof of claims. **EXHIBIT I**
18. ECI / Cougar was told by Judge Bertin to have Bankruptcy Court give him a Judgment and he could transfer it to Montgomery County.
19. On April 29,2019 ECI /Cougar filed in Bankruptcy Court to have his proof of claims entered as money judgments. Doc #650 **EXHIBIT J**
20. Motion was denied
21. October 8, 2019 ECI/ Cougar filed another petition to confirm Bankruptcy Judgments and does not serve the Trustee. **EXHIBIT K**
22. **This happens 2 more times then eventually they get Judgments.**
23. ECI/ Cougar and Saracini misrepresent the settlement agreement and get Summary Judgements against Campisi Construction ONLY. With NO SERVICE to the TRUSTEE<sup>2</sup> **EXHIBIT L**

---

<sup>2</sup> Mr. Saracini has lied to police about equipment, gave false testimony to Judges and filed fraudulent exhibits saying I sued in small claims for \$12000. Later the truth came out in testimony. Montgomery County is bias against pro se litigants and will not accept my filings.

24. **The Judgment Orders read Campisi Construction but ECI/ Cougar are including Anthony Campisi on the writ of executions. EXHIBIT M**
25. **ECI garnished the Montgomery County Clerk of Courts then has me falsely arrested (TWICE NOW) EXHIBIT N**

In conclusion every point of Judge Fitzsimons Court Order was violated by ECI and Cougar. Every Judgment including proof of claim #7 there was no DUE PROCESS

This ball of lies has taken up 13 years of my life. Mr. Saracini can do no wrong in Montgomery County. I have fifty more fraudulent filings and lies. I pray this Honorable Court awards Sanctions and grants relief or ECI/ Cougar's will not stop.



Anthony G Campisi

9/16/2024